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March 16, 2022

Via ECF

Hon. Debra Freeman, U.S.M.J.
Daniel Patrick Moynihan
United States Courthouse, Courtroom 17A
500 Pearl Street
New York, NY 10007

Re: Case Name: Morales Campos et al. v. Up Thai Corp. et al.
Case Number: 1:19-cv-04730-GHW-DCF

Dear Judge Freeman:

We represent the following defendants, Up Thai Corp. d/b/a Tung Thong 181, Jirapat Puttanawong, (collectively “Defendants”) in the above subject action. We write to you request a short telephone conference with this court tomorrow (March 17, 2022) or Monday (March 21, 2022) to request additional time for parties to settle this matter.

We choose not to provide detailed update on this matter herein in writing to avoid inadvertent disclosure of potential confidential information in parties’ settlement discussion.

Thank you for your time and consideration.

Very truly yours,

/s/Bingchen Li
Bingchen Li